

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RICHARD CATRAMBONE,	)	Case No. 08-cv-1655
	)	
Plaintiff,	)	Judge Andersen
	)	
v.	)	Magistrate Judge Brown
	)	
THOMAS ADAMS,	)	
	)	
Defendant.	)	

**NOTICE OF FILING**

To: Carlton E. Odim, Esq.  
Shestokas, Raines, et al.  
19 S. LaSalle St., Suite 1402  
Chicago, IL 60603

PLEASE TAKE NOTICE THAT on June 4, 2008, we caused to be filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, **PLAINTIFF'S REPLY TO AFFIRMATIVE DEFENSES OF DEFENDANT**, a copy of which is attached hereto and served upon you.

**RICHARD CATRAMBONE**, Plaintiff.

By: /s/ Ariel Weissberg  
One of his attorneys

Ariel Weissberg, Esq. (No. 03125591)  
Rakesh Khanna, Esq. (No. 06243244)  
Weissberg and Associates, Ltd.  
401 S. LaSalle St., Suite 403  
Chicago, IL 60605  
T. 312-663-0004  
F. 312-663-1514

**CERTIFICATE OF SERVICE**

I, Ariel Weissberg, certify that on June 4, 2008, I caused to be served **PLAINTIFF'S REPLY TO AFFIRMATIVE DEFENSES OF DEFENDANT**, to the above-named party by the court's ECF electronic filing system.

\_\_\_\_\_/s/ Ariel Weissberg\_\_\_\_\_  
**Ariel Weissberg**

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Defendant.	)	

**PLAINTIFF'S REPLY TO AFFIRMATIVE DEFENSES OF DEFENDANT**

NOW COMES Plaintiff, by his attorneys, Ariel Weissberg, Rakesh Khanna and the law firm of Weissberg and Associates, Ltd., and as his Reply to the Affirmative Defenses of Defendant, Thomas Adams, states as follows:

Affirmative Defense No. 1:

Under the doctrine of unclean hands, Richard Catrambone is not entitled to equitable relief, including declaratory relief, because he committed fraud against Thomas Adams and breached his fiduciary duties toward Thomas Adams as determined by a jury in the case of *Adams v. Catrambone*, 02 C 8700 [Federal District Court, Northern District of Illinois].

Reply:

Plaintiff denies the statements contained in the First Affirmative Defense of Defendant.

Affirmative Defense No. 2:

Under the doctrine of unclean hands, Richard Catrambone is not entitled to contribution, because he committed fraud against Thomas Adams and breached his fiduciary duties toward Thomas Adams as determined by a jury in the case of Adams v. Catrambone, 02 C 8700 [Federal District Court, Northern District of Illinois].

Reply:

Plaintiff denies the statements contained in the Second Affirmative Defense of Defendant.

Affirmative Defense No. 3:

Richard Catrambone is not entitled to relief, because his complaint fails to state grounds upon which relief may be granted.

Reply:

Plaintiff denies the statements contained in the Third Affirmative Defense of Defendant.

**RICHARD CATRAMBONE**, Plaintiff

By: /s/ Ariel Weissberg  
One of his attorneys

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Rakesh Khanna, Esq. (06243244)  
Weissberg and Associates, Ltd.  
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